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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ARIELLE FLETCHER,

Plaintiff,

v.

GATEWAY GROUP ONE,  
BENJAMIN OKOLI, STATE OF NEW  
JERSEY, COUNTY OF ESSEX, CITY  
OF NEWARK, CITY OF ELIZABETH,  
EMERSON RUSSELL,  
MAINTENANCE COMPANY  
AVIATION, PORT AUTHORITY OF  
NEW YORK AND NEW JERSEY

Defendants.

Civil Action No. 2:20-cv-3413

**DEFENDANT'S RULE 56  
STATEMENT OF UNDISPUTED  
MATERIAL FACTS**

1. The within matter relates to an action brought by Plaintiff Arielle Fletcher against her employer Gateway Group One for maintaining a hostile work environment, sex-discrimination, and retaliation under Title VII of the Civil Rights Act of 1964. (See Plaintiff's Amended Complaint attached hereto as *Exhibit A, para, 3*).

2. Plaintiff alleges that Gateway Group One has a facility located in Newark Liberty International Airport in Newark, New Jersey. (*Exhibit A, para. 15*).
3. The City of Elizabeth is named as a defendant. Plaintiff alleges that Elizabeth partially owns the Newark Liberty International Airport and therefore is the head of the relevant executive agency pursuant to 42 U.S.C. § 2000e-16(c). (*Exhibit A, para, 13*).
4. However, the City of Elizabeth does not own, maintain, operate or control the Newark Liberty International Airport. (See Certification of William R. Holzapfel attached hereto as *Exhibit B*).
5. The City of Elizabeth has no connection or relationship with Gateway Group One. (*Exhibit B*).
6. The Defendant City of Elizabeth moves for summary judgment based on the inability to demonstrate any liability on its part as a matter of law.